

In the United States District Court

For the Southern District of Texas

Houston Division

U.S.
v.
Justina Uzowulu

No. 4:16-CR-234-2
Hon. Charles Eskridge

Motion to Return Passports
And to Allow Travel in September

Judge Eskridge,

Please order Ms. Uzowulu's Nigerian and United States passports returned to her, and allow her to travel to Nigeria in September to visit family.

Ms. Uzowulu surrendered her passports as condition 8.g. of her conditions of release in June, 2016.

In December, 2020, Ms. Uzowulu's mother fell ill in Nigeria. Ms. Uzowulu asked (Doc. 213) for permission to travel to Nigeria to be with her mother. Judge Gilmore denied (Doc. 215) permission.

On March 8, 2021, Ms. Uzowulu's mother passed away. Ms. Uzowulu asked (Doc. 219) for permission to travel to Nigeria for the funeral services. Judge Gilmore denied (Doc. 224) permission.

On June 16, 2022, this Court imposed a three-year probation term, assessed a \$4,100 fine and a \$100 Special Assessment, and imposed a \$4,100 money judgment.

Ms. Uzowulu's family got together, and covered her monetary penalties. They paid (Exhibit 1) the money judgment by wire transfer

on June 27, 2022. They paid (Exhibit 2) the fine and Special Assessment by check or money order on June 28, 2022.

RETURN OF PASSPORTS

Please order that the District Clerk return Ms. Uzowulu's passports to her.

TRAVEL TO NIGERIA

Please permit Ms. Uzowulu to travel to Nigeria for thirty days beginning in September, 2022 to reconnect with family and honor her mother.

When this Court asked the Government, on June 16, 2022, why Ms. Uzowulu should, after six years on conditions of release, now be on probation, the first reason the Government cited was so that a probation officer could ensure that she paid her debts.

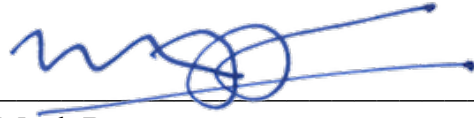
Her family has resolved that concern.

There may be other reasons for Ms. Uzowulu to be under supervision for another three years, and Ms. Uzowulu, a United States Citizen, does not intend to violate her probation, and will return after her travel to complete her probation.

CERTIFICATE OF SERVICE AND CONFERENCE

The Government opposes. I sent a copy of this *Motion* to the government before filing it.

Thank you,



Mark Bennett

SBN 00792970

Bennett & Bennett

917 Franklin Street, Fourth Floor

Houston, Texas 77002

713.224.1747

mb@ivi3.com